

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

SCRAMOGE TECHNOLOGY LTD.,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. and  
SAMSUNG ELECTRONICS AMERICA,  
INC.,

Defendants.

---

SCRAMOGE TECHNOLOGY LTD.,

Plaintiff,

v.

APPLE INC.,

Defendant.

---

SCRAMOGE TECHNOLOGY LTD.,

Plaintiff,

v.

GOOGLE LLC,  
Defendant.

Case No. 6:21-cv-00454-ADA

Case No. 6:21-cv-00579-ADA

Case No. 6:21-cv-00616-ADA

**JOINT CLAIM CONSTRUCTION STATEMENT**

**I. Undisputed Constructions**

The parties do not have any undisputed constructions.

## II. Disputed Constructions

#	Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction
1	“[arranged/provided] on” ’215 Patent, Claims 1, 9, 13 and 19 (Proposed by all Defendants)  ’370 Patent, Claims 1 and 9 (Proposed by Samsung and Google)	Plain and ordinary meaning	in contact with directly or indirectly through an adhesive
2	“a [first/second] surface of the plurality of soft magnetic layers” ’215 Patent, Claims 1 and 13 (Proposed by all Defendants)	Plain and ordinary meaning	a [first/second] surface of more than one of the soft magnetic layers
3	“the [first/second] polymeric material layer includes a [first/second] extending portion extending longer than the plurality of soft magnetic layer / the [first/second] polymeric material layer comprises a [first/second] extending portion extending longer than the plurality of soft magnetic layers” ’215 Patent, Claims 1 and 13 (Proposed by Google)	Plain and ordinary meaning	Indefinite
4	“a [first/second] magnetic sheet” ’962 Patent, Claims 1, 7, 9, and 18 (Proposed by all Defendants)	Plain and ordinary meaning	a [first/second] continuous planar magnetic material

#	Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction
5	“wherein a height of a highest position of the second magnetic sheet from the substrate is higher than a height of a lowest position of the receiving coil from the substrate” ’962 Patent, Claims 1 and 18 (Proposed by all Defendants)	Plain and ordinary meaning	wherein the highest point of the second magnetic sheet from the substrate in between adjacent receiving coil portions is higher than the lowest point of the receiving coil from the substrate at the adjacent receiving coil portions
6	“a second polymeric film provided on the plurality of soft magnetic layers” ’370 Patent, Claim 1 (Proposed by Samsung and Google)	Plain and ordinary meaning	a second polymeric film in contact with more than one of the soft magnetic layers
7	“plurality of soft magnetic layers provided on the first adhesive layer” ’370 Patent, Claim 1 (Proposed by Samsung and Google)	Plain and ordinary meaning	more than one soft magnetic layer in contact with the first adhesive layer
8	“the [first/second] polymer film includes a [first/second] extending portion that extends further than the plurality of soft magnetic layers” ’370 Patent, Claim 1 (Proposed by Google)	Plain and ordinary meaning	Indefinite

#	Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction
9	<p>“a [first/second] extending adhesive portion that extends further outward than the side portion of the plurality of soft magnetic layers, and a portion of the [first/second] extending adhesive portion is provided in the connected area”</p> <p>'370 Patent, Claims 12 and 15 (Proposed by Google)</p>	Plain and ordinary meaning	Indefinite
10	<p>“receiving space”</p> <p>'740 Patent, Claims 1-3, 6, 7, and 8 (Proposed by Google)</p> <p>'740 Patent, Claims 6, 7, and 16 (Proposed by Apple)</p> <p>'565 Patent, Claims 1 and 12 (Proposed by Apple)</p>	Plain and ordinary meaning	empty space for the connecting unit extending from one surface of the substrate to an opposing surface of the substrate
11	<p>“overlaps the receiving space in a [second] direction parallel to the upper surface of the substrate”</p> <p>'565 Patent, Claims [1], 12 (Proposed by Apple)</p>	Plain and ordinary meaning	Indefinite

#	Term	Plaintiff's Proposed Construction	Defendants' Proposed Construction
12	“a first region in which at least one of the first layer and the second layer overlaps the wireless power receiving coil in a vertical direction perpendicular to an upper surface of the shielding unit” ’842 Patent, Claims 1 and 19 (Proposed by Apple)	Plain and ordinary meaning	Indefinite
13	“reception space in a predetermined area” ’842 Patent, Claim 15 (Proposed by Apple)	Plain and ordinary meaning	a cavity shaped to allow a wireless charging circuit to be inserted through an opening and into the cavity
14	“disposed as a 2x2 matrix” ’476 Patent, Claim 1 (Proposed by Scramoge and Samsung)	arranged such that there are two rows and columns	arranged such that there are two orthogonal rows and columns
15	“disposed under the second coil pattern” ’476 Patent, Claims 2, 3, 4 (Proposed by Samsung)	Plain and ordinary meaning	Indefinite
16	“disposed at an inner side of the first magnetic sheet member” ’482 Patent, Claim 1 (Proposed by Samsung)	Plain and ordinary meaning	located such that the first magnetic sheet surrounds the second magnetic sheet

Dated: May 2, 2022

Respectfully submitted,

/s/Brett E. Cooper

Reza Mirzaie (CA SBN 246953)

[rmirzaie@raklaw.com](mailto:rmirzaie@raklaw.com)

Marc A. Fenster (CA SBN 181067)

[mfenster@raklaw.com](mailto:mfenster@raklaw.com)

Brett E. Cooper (NY SBN SBN 4011011)

[bcooper@raklaw.com](mailto:bcooper@raklaw.com)

Brian D. Ledahl (CA SBN 186579)

[bledahl@raklaw.com](mailto:bledahl@raklaw.com)

Seth Hasenour (TX SBN 24059910)

[shasenour@raklaw.com](mailto:shasenour@raklaw.com)

James A. Milkey (CA SBN 281213)

[jmilkey@raklaw.com](mailto:jmilkey@raklaw.com)

Drew B. Hollander (NY SBN 5378096)

[dhollander@raklaw.com](mailto:dhollander@raklaw.com)

Christian W. Conkle (CA SBN 306374)

[cconkle@raklaw.com](mailto:cconkle@raklaw.com)

Jonathan Ma (CA SBN 312773)

[jma@raklaw.com](mailto:jma@raklaw.com)

RUSS AUGUST & KABAT

12424 Wilshire Blvd. 12th Floor

Los Angeles, CA 90025

Phone: (310) 826-7474

Facsimile: (310) 826-6991

*Counsel for Plaintiff Scramoge Technology  
Limited*

DATED: May 2, 2022

Respectfully submitted,

By: /s/ John Kappos

Ryan K. Yagura (Tex. Bar No. 24075933)

ryagura@omm.com

Nicholas J. Whilt (admitted *Pro Hac Vice*)

nwhilt@omm.com

O'MELVENY & MYERS LLP

400 S. Hope Street

Los Angeles, CA 90071

Telephone: 213-430-6000

Facsimile: 213-430-6407

John C. Kappos (admitted *Pro Hac Vice*)

jkappos@omm.com

Cameron W. Westin (admitted *Pro Hac Vice*)

cwestin@omm.com

Bo Moon (admitted *Pro Hac Vice*)

bmoon@omm.com

Andrew S. Bledsoe (admitted *Pro Hac Vice*)

abledsoe@omm.com

O'MELVENY & MYERS LLP

610 Newport Center Drive, 17th Floor

Newport Beach, California 92660

Telephone: 949-823-6900

Facsimile: 949-823-6994

Timothy S. Durst (Tex. Bar. No. 786924)

tdurst@omm.com

Jeffery D. Baxter

jbxter@omm.com (admitted *Pro Hac Vice*)

O'MELVENY & MYERS LLP

2501 North Harwood Street, Suite 1700

Dallas, TX 75201

Telephone: 972-360-1900

Facsimile: 972-360-1901

Melissa Richard Smith

GILLAM AND SMITH LLP (Tex. Bar No.

24001351)

303 South Washington Avenue

Marshall, TX 75670

Telephone: 903-934-8450

Facsimile: 903-934-9257

*Counsel for Samsung Electronics, Co., Ltd.  
and Samsung Electronics America, Inc.*

*/s/ Alton Absher III*

J. Stephen Ravel TX State Bar No. 16584975  
303 Colorado St Ste 2000  
Austin, TX 78701-0022  
Telephone: (512) 495-6429  
Facsimile:(512) 495-6401  
Email: steve.ravel@kellyhart.com

Steven D. Moore (*admitted in W.D. Tex.*)  
Rishi Gupta (*admitted pro hac vice*)  
Two Embarcadero Center, Suite 1900  
San Francisco, CA 94111  
Telephone: (415) 576-0200  
Facsimile: (415) 576-0300  
Email: smoore@kilpatricktownsend.com  
Email: rgupta@kilpatricktownsend.com

Alton L. Absher III (*admitted in W.D. Tex.*)  
Andrew W. Rinehart (*admitted pro hac vice*)  
1001 West Fourth Street  
Winston-Salem, NC 27101  
Telephone: (336) 607-7300  
Facsimile: (336) 607-7500  
Email: aabsher@kilpatricktownsend.com

Mansi H. Shah (*admitted pro hac vice*)  
1080 Marsh Road  
Menlo Park, CA 94025  
Telephone: (650) 326-2400  
Facsimile: (650) 326-2422  
Email: mansi.shah@kilpatricktownsend.com

Amanda N. Brouillette (*admitted pro hac vice*)  
Suite 2800  
1100 Peachtree Street NE  
Atlanta , GA 30309-4528  
Telephone: (404) 815-6500  
Facsimile: (404) 815-6555  
Email: abrouillette@kilpatricktownsend.com

Kasey E. Koballa (*admitted pro hac vice*)  
4208 Six Forks Road  
Raleigh, NC 27609  
Telephone: (919) 420-1700  
Facsimile: (919) 420-1800  
Email: kkoballa@kilpatricktownsend.com

Christopher P. Schaffer (*admitted pro hac vice*)  
Suite 250  
12255 El Camino Real  
San Diego, CA, 92130  
Telephone: (858) 350-6100  
Facsimile: (858) 350-6111  
Email: cschaffer@kilpatricktownsend.com

*Counsel for Defendant Apple Inc.*

/s/Bijal V. Vakil

J. Mark Mann  
State Bar No. 12926150  
mark@themannfirm.com  
G. Blake Thompson  
State Bar No. 24042033  
blake@themannfirm.com  
MANN | TINDEL | THOMPSON  
201 E. Howard St.  
Henderson, Texas 75654  
(903) 657-8540  
(903) 657-6003 (fax)

Bijal V. Vakil (CA Bar No. 192878)  
(*admitted to the Western District of Texas*)  
Allen & Overy LLP  
530 Lytton Ave 2nd Floor  
Palo Alto, CA 94301  
Telephone: (650) 388-1650  
Email: googlescramoge@allenovervy.com

Shamita Etienne Cummings (CA Bar No. 202090)  
(*admitted to the Western District of Texas*)  
Allen & Overy LLP  
1101 New York Avenue, NW  
Washington, DC 20005  
Telephone: (202) 683-3800  
Email: googlescramoge@allenovervy.com

*Counsel for Defendant Google LLC.*

**CERTIFICATE OF SERVICE**

I hereby certify that the counsel of record who are deemed to have consented to electronic service are being served on May 2, 2022 with a copy of this document via the Court's ECF system.

/s/Drew B. Hollander  
Drew B. Hollander